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7 Attorney for: Plaintiff

8 **IN THE**  
9 **UNITED STATES DISTRICT COURT**  
10 **FOR THE NORTHERN MARIANA ISLANDS**

11 **EMERENCIANA PETER-**  
12 **PALICAN,**

13 **Plaintiff,**

14 **vs.**

15 **GOVERNMENT OF THE**  
16 **COMMONWEALTH OF THE**  
17 **NORTHERN MARIANA ISLANDS,**  
18 **and TIMOTHY P. VILLAGOMEZ,**  
19 **in his official and individual**  
20 **capacities,**

21 **Defendants.**

22 **CIVIL ACTION NO. 07-0022**

23 **PLAINTIFF'S MOTION FOR**  
24 **PARTIAL SUMMARY JUDGMENT**

25 **Date : February 28, 2008**

26 **Time: 9:00 AM**

27 **Judge: A. Munson**

28 Comes now Emerenciana Peter-Palican, plaintiff herein, and moves this court for its  
order granting partial summary judgment on the grounds that there are no genuine issues  
regarding material facts and plaintiff is entitled to judgment as a matter of law.

This motion is made pursuant to Rule 56 F.R.C.P. and based upon the memorandum  
of points and authorities and exhibits filed herewith and the files and records of the case  
herein.

Dated this 16<sup>th</sup> day of January, 2008.

DOUGLAS F. CUSHNIE  
Attorney for Plaintiff

/s/  
DOUGLAS F. CUSHNIE